

Risk Management Plan Updates

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When is a Risk Management Plan Update Required

- At least every five years from the latest update or original submittal
 - June 1999 first submittal requirement for the new risk management plan. 2004 first update. 2009 next five year
 - Five years after entering the program

Within six months of

- A change that requires a new hazard analysis
- A change that requires a new offsite consequence analysis
- A change that results in a new program level

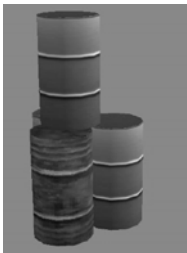
So what requires a new PHA/HA?

- When a major change of the process occurs.
- What is a major change?
- Regulations do not specify
- Possible major changes:
 - New materials
 - New equipment
 - New location/building

How about a new OCA?

- Any change in the process that changes the distance to the endpoint by a factor of two.
- Inverse square law comes into effect here.
- Doubling the quantity may not double the distance

New OCA?



[illegible]

The screenshot shows a presentation slide titled "Two tons of chlorine". A text box on the slide contains the following information:

Chemical: Chlorine
 CAS #: 7782-50-5
 Emergency: Toxic Gas
 Lower Level: Under pressure
 Inventory: 60000000, 4000 pounds

Estimated Distance to Toxic Endpoints:
 5 Leaky
 3.1 kilometers

Use the estimated distance to the toxic endpoint specified for this material abundance under the EPCF Risk Report all distances under that 5 mile or 8.1 mile, and all distances greater than 8.1 mile are 8.1 miles

Buttons: Start Over, Help, Back, Print Results

Footer: Click to add notes

5,000 gallons 20% ammonia
0.1 miles

ERG Entry

Ammonia, Anhydrous (liquefied under pressure) - 2.3

Hazard Class: 2.3
Hazardous: Toxic Liquid
Hazardous: Corrosive
Hazardous: Irritant
Hazardous: Flammable
Hazardous: Oxidizing
Hazardous: Radioactive
Hazardous: Other

Estimated Distance to Toxic Endpoints:
0.1 miles
0.1 kilometers

This is the estimated distance to the toxic endpoint specified for the material substance under the ERG Book. Report all distances shorter than 0.1 mile or 0.1 km, and all distances longer than 0.1 mile or 0.1 km.

Next Slide Type Back Previous Slide

The screenshot shows the LabVIEW software environment. The front panel has a title '5,000 gallons 20% ammonia'. A small window titled 'Test Endpoints' is open over the back panel. This window contains the following information:
Test Endpoints
General: ammonia tank endpoint test
Type: Tank Endpoint
Parameter: TestTankEndpoint
Number of Measurements: 6000
Label Temperature: 70 F
Estimated Duration or Tank Endpoints: 0.1 min
0.1 Min Run Time
This is the default duration to the test endpoint specified for this endpoint.
Minimum duration is 0.05 Min. If you specify a value less than 0.1 min or 0.1 min, and all durations longer than .20 min or .20 min.
At the bottom of the window are four buttons: Abort Over, Yes, No, Back, and Next.[illegible]

- Enclosed buildings
- Dikes/berms
- Covered holding tanks
- Polyballs?

- Pipe leaks
- Delivery losses
- Temporary vessel leaks
- Over pressurization with a relief valve

Chlorine delivery



Change in Prevention Program Level

- Usually a change in the quantity of the regulated substance
- You can go up in Prevention Program or down
- Also your OCA can affect your program level. If you have no offsite impacts, you may qualify for Prevention Program 1

Program Change Example

- Ethylene oxide sterilization facility increases quantity of the regulated substance handled from 2,500 pounds to 25,000 pounds
- Now they meet the Federal Table 1 threshold
- Prevention Program Level is changed from 2 to 3

Program Level can Decrease as well

- Water treatment plant handles four tons of chlorine. Federal Table 1 (Program 3) threshold is 2,500 pounds.
- The plant switches over to one ton of chlorine.
- Are they eligible for Program 2?

Answer

- Not in this case
- Process Safety Management Threshold Quantity is 1500 pounds
- CCR Title 19 2735.4(e)(2) requires facilities Program 3 for facilities subject to Process Safety Management
- What if the plant switches to 9 x 150 pound (1350 pounds total) cylinders?

Answer

This facility now is under the Federal Table 1 and Process Safety Management Threshold Quantities

They still exceed the California State Table 3 Threshold of 100 pounds, but can be subject to Program 1 or 2.

Other listed update/new submission requirements

- Within three years of a new chemical being listed as a regulated substance
- Before a regulated substance exceeds the threshold quantity in an existing process
- Before a new process handles a regulated substance above the threshold quantity

Points to remember about updates

- At least every five years
- 2x change in the OCA endpoint
- When you are required to complete a new Process Hazard Analysis/Hazard Analysis
- Program level change
- Before a threshold quantity is first exceeded in an existing or new process

What is required in a Risk Management Plan Update?

- The entire document must be reviewed, not necessarily rewritten
- If a section needs to be changed, please submit a new section, not page. This is to keep the document consistent and flowing.
- Should be a group effort among safety staff, operators, and management

Hazard Assesment/OCA

- Is there new census data available
- Has the surrounding area developed
- Who are the new potential populations and sensitive receptors
- Has the regulated substance changed
- Has the toxic endpoint changed
- Has the computer modeling changed

Process Hazard Analysis and Hazard Analysis

- Has the process changed
- Has there been any management of change caliber changes to the system
- Any new safety features
- Changes in operator procedures
- Remember to include all levels of employees involved with the process
- You may wish to include consultants, regulators, and emergency responders

Five Year Accident History

- Remove events over five years old
- Continue to include accidents less than five years old
- Any new accidents must be added to your accident history as a mandatory Risk Management Plan correction, not an update.

Catastrophic Release



Prevention Programs 2 and 3

- Review and update as needed all seven Program 2 and twelve Program 3 elements
- For Program 3 make sure your operating procedures have been certified annually
- Update the dates for the latest 3 year compliance audits and training and submit these with the updated Risk Management Plan

Emergency Response Plan

- Responding agencies review procedures and equipment
- Non-responding agencies check for their inclusion in the community emergency response plan (area plan)

Emergency Responders



Risk Management Plan Certification

Submit a new Risk Management Plan certification signed by the facility owner or operator

What if there is a change in the owner/operator?

- Within 30 days new registration information must be provided to the Administering agency
- The new owner/operator shall determine if Risk Management Plan changes are necessary



Risk Management Plan Update Distribution

- Federally regulated facilities submit electronically to the USEPA by RMP Submit and hard copy to Administering Agency
- State regulated facilities submit a hard copy to the Administering Agency
- The facility should keep at least one complete copy with related technical documents on the process site

Public Review

- Anyone in the public can comment on your Risk Management Plan Public document for 45 days after approval by the Administering Agency



Public Notification

- The public has access to your Risk Management Plan Public Document
- Public notification by newspaper is needed once submitted and again after Administering Agency approval

Any Questions?

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